

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

In Re:)	
)	
Dennis Dallos)	
Janice Casterlin,)	Case No.: 25-11252
)	Chapter 13
Debtor)	

**MOTION TO IMPOSE THE AUTOMATIC STAY WITH NOTICE OF OPPORTUNITY OF
HEARING, NOTICE OF HEARING, BRIEF IN SUPPORT AND CERTIFICATE OF SERVICE**

NOTICE OF OPPORTUNITY FOR HEARING

Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102 no later than 14 days from the date of filing of this request for relief. You should also serve a file-stamped copy of your response or objection to the undersigned movant/movant's attorney and others who are required to be served and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice.

The 14 day period includes the three (3) days allowed for mailing provided for in Bankruptcy Rule 9006(f).

NOTICE OF HEARING

Notice is hereby given that if a response to the foregoing is filed, the hearing on the matter will be held on **May 20, 2025, at 2:00 p.m.** in the 2nd floor courtroom of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102. If no response is timely filed and the court grants the requested relief prior to the above-referenced hearing date, the hearing will be stricken from the docket of the Court.

BRIEF IN SUPPOT OF MOTION

COMES NOW, Dennis Dallos and Janice Casterlin, Debtors in the above-styled bankruptcy proceeding, by and through their attorney Colin R. Barrett of Luke Homen Law, PLLC, and does file with this Court his Motion to Impose the Automatic Stay. In support, Debtors would respectfully show the Court the following:

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157(a) and (b), 1334 and

the United States District Court's general order of reference. Venue of this matter in this District is proper pursuant to 28 U.S.C. § 1409.

2. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(A) and (G).
3. Pursuant to 11 U.S.C. § 362(c)(4)(B), the debtors request an order imposing the automatic stay.
4. Debtor has filed two previous bankruptcies within the year preceding the commencement of this case. Both cases were dismissed prior to Confirmation.
5. Debtor first filed a Chapter 13 Bankruptcy in the Western District of Oklahoma on July 10, 2024 with case number 24-11903. Confirmation was denied and this case was dismissed by Order of this Court on October 10, 2024.
6. Debtor then filed a Chapter 13 Bankruptcy in the Western District of Oklahoma on December 18, 2024 with case number 24-13570. Confirmation was denied and this case was dismissed by Order of this Court on March 27, 2025.
7. The primary reason both of these previous cases were dismissed is due to Debtors' legal representation. In both cases, Debtors' believe they were not adequately represented by counsel and allowed both cases to dismiss rather than be confirmed.
8. This case was filed in good faith because Debtors have obtained new counsel to file the instant Chapter 13 bankruptcy. Now that Debtors have obtained new counsel, Debtors are willing and able to successfully complete their Chapter 13 Plan. *See Debtors' Affidavit*, attached hereto as Exhibit "A"

WHEREFORE, DEBTOR RESPECTFULLY REQUEST that the impose the automatic stay against all Creditors; and for other such relief as the court deems just and proper.

Dated: April 30, 2025

Luke Homen Law, PLLC

By: /s/ Colin R. Barrett
Colin R. Barrett
OK Bar #31936
Luke Homen Law PLLC

10313 Greenbriar Parkway
Oklahoma City, Oklahoma 73159
colin@lukehomenlaw.com
(405) 639-2099
(405) 842-0787 (fax)

CERTIFICATE OF MAILING

I certify that on April 30, 2025, I electronically transmitted the Motion to Impose Automatic Stay filed on April 30, 2025, herein as Docket Number 8, to the Clerk of the Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit the foregoing to all ECF registrants, to include the following:

Office of the AUST	John T. Hardeman Chapter 13 Trustee	
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Pursuant to Bankruptcy Rule 1009, I certify that on April 30, 2025, the Motion to Impose Automatic Stay was forwarded via U.S. Mail, first class postage prepaid and properly addressed, to the following at the addresses shown below and upon those parties in interest as listed on the following attached page(s):

See Attached Creditor Matrix

/s/Colin R. Barrett
Colin R. Barrett

Label Matrix for local noticing
1087-5
Case 25-11252
Western District of Oklahoma
Oklahoma City
Wed Apr 30 08:35:12 CDT 2025

USBC Western District of Oklahoma
215 Dean A. McGee
Oklahoma City, OK 73102-3426

AMEX
PO Box 981537
El Paso, TX 79998-1537

Affirm Inc
30 Isabella St 4th floor
Pittsburgh, PA 15212-5862

Ally
PO Box 660371
Dallas, TX 75266-0371

Bankers Healthcare Group
PO Box 332509
Murfreesboro, TN 37133-2509

Barber & Bartz APC
525 S Main St Ste 800
Tulsa, OK 74103-4511

Barclays
PO Box 8833
Wilmington, DE 19899-8833

Bluevine Inc
401 Warren St
Redwood City, CA 94063-1536

Bronco Equipment Rental
2122 S East Ave
Cushing, OK 74023-5018

C3 Rental LLC
107 Imperial Blvd Ste 10
Hendersonville, TN 37075-3441

(p)CAC FINANCIAL CORP
2601 NW EXPRESSWAY STE 1000E
OKLAHOMA CITY OK 73112-7236

Capl/kohls Dept Store
N56 W 17000 Ridgewood Dr
Menomonee Falls, WI 53051-5660

Capital One
PO Box 30285
Salt Lake City, UT 84130-0285

(p)CARRINGTON MORTGAGE SERVICE LLC
1600 S DOUGLAS RD SUITE 110
ANAHEIM CA 92806-5951

(p)CENTRAL ANESTHESIA ASSOCIATES
PO BOX 248819
OKLAHOMA CITY OK 73124-8819

Chexsystems
Attn: Consumer Relations
Po Box 583399
Minneapolis, MN 55458-3399

(p)DISCOVER FINANCIAL SERVICES LLC
PO BOX 3025
NEW ALBANY OH 43054-3025

Flowering Peach
354 Catawba Ct
Lexington, SC 29072-9500

GFS Capital
901 5th Ave Ste 1200
Seattle, WA 98164-2017

Hall & Ludlam PLLC
210 Park Ave. 3001
Oklahoma City, OK 73102-5649

Internal Revenue Service
Po Box 7346
Philadelphia, PA 19101-7346

(p)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

Jpmcb Card
PO Box 15369
Wilmington, DE 19850-5369

Kansas Counselors
PO Box 14765
Lenexa, KS 66285-4765

LVNV Funding LLC
PO Box 10497
Greenville, SC 29603-0497

(p)LABORATORY CORPORATION OF AMERICA
ATTN GOVERNMENT AUDITS
PO BOX 2270
BURLINGTON NC 27216-2270

Midland Credit Management
PO Box 939069
San Diego, CA 92193-9069

Oklahoma Spine Hospital
PO Box 803918
Kansas City, MO 64180-3918

Oklahoma Tax Commission
Attn: Legal-Bankruptcy
PO Box 269056
Oklahoma City, OK 73126-9056

Opportunity Fund
111 W Saint John St
San Jose, CA 95113-1121

Portfolio
Po Box 4115
Concord, CA 94524-4115

QFS Capital
110 E Broward Blvd Ste 1550
Ft Lauderdale, FL 33301-3553

(p)RCB BANK ATTN SPECIAL ASSETS
300 W PATTI PAGE BLVD
CLAREMORE OK 74017-8039

Resurgent Capital Service LP
PO Box 10465
Greenville, SC 29603-0465

Robert Redwine
400 N Walnut Ave
Oklahoma City, OK 73104-2207

Sst/medallion
1100 E 6600 S Ste 510
Murray, UT 84121-7422

Stephen Bruce & Associates
Po Box 808
Edmond, OK 73083-0808

Stillwater Medical Center
1323 W 6th Ave
Stillwater, OK 74074-4399

Syncb/Sams
Po Box 965065
Orlando, FL 32896-0001

Syncb/amazon
Po Box 965015
Orlando, FL 32896-5015

Synchrony Bank
Attn: Bankruptcy Dept
Po Box 965064
Orlando, FL 32896-5064

Synchrony/PayPal Credit
Po Box 965005
Orlando, FL 32896-5005

Synovus Bank
1111 Bay Ave
Columbus, GA 31901-5218

Systems & Services Tech
4315 Pickett Rd
Saint Joseph, MO 64503-1600

The Mortgage Law Firm, PLLC
421 NW 13th St. 300
Oklahoma City, OK 73103-3743

Timepayment Corp
200 Summit Dr Ste 100
Burlington, MA 01803-5274

Tinker Fcu
Po Box 45750
Oklahoma City, OK 73145-0750

United States Trustee
United States Trustee
215 Dean A. McGee Ave., 4th Floor
Oklahoma City, OK 73102-3479

Colin Richard Barrett
Luke Homen Law PLLC
10313 Greenbriar Pkwy
Oklahoma City, OK 73159-7648

Dennis Dallos
714 Lakeview Dr
Cushing, OK 74023-4743

Janice Marie Casterlin
714 Lakeview Dr
Cushing, OK 74023-4743

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

CAC Financial
2601 Nw Expressway Ste 1000e
Oklahoma City, OK 73112-7238

Carrington Mortgage Se
Po Box 660586
Dallas, TX 75266-0586

Central Anesthesia Associates, LLC
Po Box 248819
Oklahoma City, OK 73124-8819

Discover Bank
P O Box 15316
Wilmington, DE 19850

Jefferson Capital
Po Box 7999
Saint Cloud, MN 56302-7999

LabCorp
Po Box 2240
Burlington, NC 27216-2240

RCB Bank
Po Box 189
Claremore, OK 74018-0189

End of Label Matrix	
Mailable recipients	51
Bypassed recipients	0
Total	51